



**Environmental
Operations, Inc.**
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AWMD/WRAP-KNRP

March 12, 2013

Mr. Bruce Morrison
Project Manager
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

RE: Monthly Progress Report
Solutia – John F. Queeny Plant
St. Louis, Missouri
EPA ID No. MOD 004 954 111

RCRA



Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Monthly Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009. Per the Interim Measures Work Plan, these reports will be submitted every month.

Reporting Period

February 1, 2013 – February 28, 2013

Description of the work conducted pursuant to the Order during the reporting period.

- EOI completed the groundwater sampling event on February 13, 2013.
- EOI deferred delineation in the VV Area for PCB concentrations less than 100 and greater than 10 parts per million (ppm) while developing plans for additional removal of soil in that area identified during initial delineation as having greater than 100 ppm PCBs.
- EOI submitted a letter on February 28, 2013 outlining plans for investigation in the vicinity of MW-38A and MW-38B.
- EOI began review of the recent quarterly groundwater data received from the laboratory.
- EOI worked on revisions to the Baseline Groundwater Monitoring Report.

Estimate of the percentage of the project completed during the reporting period

- 1%

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Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- Not applicable.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

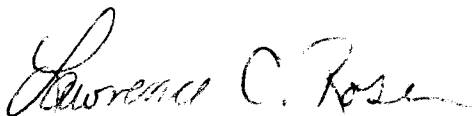
- Not applicable

Description of the projects and actions which are scheduled for the following reporting period.

- EOI will resume delineation in the VV Area for PCB concentrations less than 100 and greater than 10 ppm, and perform removal and disposal of additional PCB-containing soil with concentrations greater than 100 ppm. This work may begin in April.
- EOI will complete the review of the groundwater data and submit the data to EPA.
- EOI will complete and submit the revised Baseline Groundwater Monitoring Report.
- EOI/SWH will continue to work with the EPA regarding financial assurance information modifications and will respond accordingly.

If there are questions or concerns related to this Progress Report please contact Larry Rosen or Matt Robinson or who can be reached by phone at (314) 241-0900, or via email at larryr@environmentalops.com or matt@environmentalops.com.

Respectfully submitted,
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.
Senior Project Manager

Copy: Mr. Matt Robinson/EOI
Mr. Michael House/Solutia
Ms. Christine Kump-Mitchell/MDNR
Mr. Rich Nussbaum/ MDNR